

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
                            )  
                            Criminal Action  
V.                         )  
                            NO. 08-10251-JLT  
                            )  
CAROLYN KRAVETZ, and    )  
BORIS LEVITIN,            )  
                            )  
Defendants.              )

ASSENTED-TO MOTION TO EXTEND DEADLINE TO FILE REPLY BRIEF

Defendant Boris Levitin, through his attorney, hereby requests a two-week extension of time in which to file his reply to the government's opposition to his motions to dismiss, sever and withhold the disclosure of previously issued subpoenas. In support of this Motion, Levitin states as follows:

1.     Levitin filed pretrial motions on April 27, 2009.
2.     On June 5, 2009, the government was granted an extension of time in which to file its opposition brief, which was eventually filed on July 20, 2009.
3.     On July 29, 2009, Levitin was granted leave to file a reply brief on or before September 23, 2009 due to his belief that the Court would greatly benefit from additional briefing on several key arguments raised by the government.
4.     Due to a glut of time-sensitive matters that require counsel's immediate attention, AUSA Vassili Thomadakis has agreed to the reply being filed on or before October 7, 2009. This extension will not interfere with the October 15, 2009 hearing before this Court.
5.     Levitin has agreed to exclude speedy trial time between September 23, 2009 and October 7, 2009 in the interests of justice.

WHEREFORE, defendant Levitin respectfully requests that this Court grant his Motion.

Dated: New York, New York  
September 15, 2009

Respectfully submitted,

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By: \_\_\_\_\_

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*Attorneys for Defendant Boris Levitin*

cc: Vassili Thomadakis, Esq. (By ECF)  
Assistant United States Attorney

So Ordered:

\_\_\_\_\_  
Hon. Joseph L. Tauro, U.S.D.J.